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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

ROSA MARIA STYLES,

Debtor.

Chapter 11

Case No. 19-32881 (ABA)  
Honorable Andrew B. Altenburg, Jr., U.S.B.J

Confirmation Hearing and Time:  
March 11, 2021 at 1:00 p.m.

**CERTIFICATION OF ROSA MARIA STYLES, CHAPTER 11  
DEBTOR AND DEBTOR-IN-POSSESSION, PURSUANT TO  
BANKRUPTCY CODE SECTION 1129(a) AND (b) IN  
SUPPORT OF CONFIRMATION OF THE DEBTOR'S  
CHAPTER 11 PLAN OF REORGANIZATION**

**ROSA MARIA STYLES**, hereby certifies under the penalties of perjury as follows:

1. I am the debtor and debtor-in-possession herein (the "Debtor"). I am fully familiar with the facts set forth below upon my knowledge, except as to those matters stated to be upon information and belief, and as to those matters, I believe them to be true.
2. I filed a voluntary petition under chapter 11 of the Bankruptcy Code on December 9, 2019. Docket No. 1. I continued in the possession of my assets as a debtor-in-possession. No committee of unsecured creditors has been formed in this case. In addition, no trustee or examiner has been appointed in the Chapter 11 case.
3. On September 3, 2020, I filed my Disclosure Statement and Plan. [ECF 131, 132]. By order dated October 27, 2020, the Disclosure Statement was approved. [ECF 147]. On

February 23, 2021, I filed my First Amended Plan (the “Plan”).<sup>1</sup> [ECF 165]. The hearing on confirmation of the Plan is scheduled for March 11, 2021 at 1:00 p.m.

4. Pursuant to Section 1129(a)(1) of the Bankruptcy Code (the “Code”), the Plan complies with the applicable provisions of Title 11 of the Code.

5. I am the Plan proponent and, pursuant to Code Section 1129(a)(2), the proponent complies with the provisions of the Code.

6. Pursuant to Code Section 1129(a)(3), I have proposed the Plan in good faith and it is not in any way forbidden by law.

7. Pursuant to Code Section 1129(a)(4), I have disclosed to the Court any payments made or promised for services or for costs and expenses in connection with the case or the Plan, and such payments have been approved by, or are subject to the approval of, the Court as reasonable.

8. Pursuant to Code Section 1129(a)(5), the Reorganized Debtor will continue to manage and operate the vested property of the estate. Because I am an individual, the Reorganized Debtor will have no officers, directors or shareholders. Thus, the requirements of Code Section 1129(a)(5) have been satisfied.

9. No government regulatory commission has jurisdiction over any rates, and I am advised by counsel that the provisions of Code Section 1129(a)(6) are inapplicable to this case.

10. Pursuant to Bankruptcy Code Sections 1129(a)(7), (a)(8) and 1126(f), each holder of a claim or interest will be paid in full and therefore deemed to have accepted the Plan. These conclusions are supported as follows: (a) Class 1 has not voted on the Plan but will be paid in full; (b) Class 2 has voted to accept the Plan by 100% in numerosity and 100% in dollar amount; (c)

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<sup>1</sup> Unless otherwise stated all capitalized terms shall have the same meaning as the set forth in the Plan.

Class 3 has not voted on the Plan but will be paid in full; and (d) Class 4 has not voted on the Plan but will be paid in full.

11. Pursuant to Code Section 1129(a)(9), all administrative claims and non-tax priority claims will be paid in full on the Effective Date of the Plan, unless otherwise consented to by the claimant.

12. Code Section 1129(a)(10), is not applicable as the Debtor will be satisfying all creditors and thus has no impaired creditors.

13. Pursuant to Bankruptcy Code section 1129(a)(11), the Plan is feasible, and confirmation will not be likely followed by liquidation as evidenced by the fact that the Plan will be paid in full.

14. Confirmation is not likely to be followed by liquidation, or the need for further financial reorganization. Disposition of the Avalon Property (defined in the Plan) will satisfy all claims or such debt will be paid by my spouse, Robert Schwartz. Thus, Code Section 1129(a)(11) is satisfied.

15. Pursuant to Code Section 1129(a)(12), all quarterly fees due under 28 U.S.C. § 1930 have been paid or will be paid in full on the Effective Date of the Plan.

16. Pursuant to Code Section 1129(a)(13), we have no obligations to third parties for retiree benefits as that term is defined under Code Section 1114.

17. I am not required to pay any domestic support obligation and, accordingly, Code Section 1129(a)(14) is not applicable

18. I am an individual debtor. The value of the property to be distributed under the Plan is not less than my projected disposable income during the period for which the Plan provides payments. Consequently, Code Section 1129(a)(15) is satisfied.

19. To the extent that Code Section 1129(a)(16) applies, all transfers of property under the Plan shall be made in accordance with any applicable provisions of non-bankruptcy law that govern the transfer of property by a corporation or trust that is not a moneyed, business, or commercial corporation or trust and pursuant to Code Section 1146(a) free of any transfer or similar tax.

20. No ballots of any insiders were considered, the Plan should be confirmed pursuant to Section 1129(b) of the Code, as the Plan does not discriminate unfairly, and is fair and equitable, with respect to each class of claims that are impaired.

21. I acknowledge that, as of March 8, 2021, I owe my attorneys, McManimon, Scotland & Baumann, LLC (“MSB”), legal fees and expenses incurred as a result of these proceedings (the “Attorney Fee Obligation”). Additional legal fees and expenses shall accrue to consummate the Chapter 11 Plan and related issues. I will satisfy the Attorney Fee Obligation on the Effective Date or as otherwise agreed by MSB.

**WHEREFORE**, I respectfully request the Court confirm my Chapter 11 Plan of Reorganization and grant such other relief as the Court deems just and equitable.

I certify the foregoing statements made by me are true. I am aware if any of the foregoing statements are willfully false, I am subject to punishment.

/s/ Rosa Maria Styles  
ROSA MARIA STYLES

Dated: March 9, 2021